



only needs
filing

6372

1B

June 15, 2004

Renee H. Gelblat
Environmental Scientist
RCRA Programs Branch
U.S. Environmental Protection Agency
290 Broadway
New York, NY 10007-1866

Re: RCRA Part A Transfer - Tecumseh Redevelopment, Inc.
Former Bethlehem Steel Site, Lackawanna, NY

Dear Ms. Gelblat:

On behalf of our client, Tecumseh Redevelopment, Inc. (Tecumseh) we have prepared the attached RCRA Subtitle C Identification Form (i.e., "Part A") for the above referenced site. This submittal is in response to your request to update current site ownership and contact information at our meeting in Buffalo on May 18, 2004.

On the form, we have used the EPA ID number that was previously attached to the Bethlehem Site (NYD 002134880) which included the Galvanizing Mill on the east side of Route 5 (Hamburg Turnpike). Since the sale of the properties to ISG and Tecumseh, the Galvanizing Mill has obtained a new EPA ID number covering only their parcel.

We also list the site address on Page 1 of the form as "Hamburg Turnpike, Lackawanna, NY". This large parcel lacks a mailing address since there are no occupied or active structures at the site. For your information, we have attached a detailed legal lot survey description of the site.

We have not completed any portions of the form concerning the wastes generated, waste code information, etc. as we have no direct knowledge of these activities under the prior Bethlehem ownership. If you have any questions or require additional information, please contact me at (716) 856-0635.

Sincerely,
TurnKey Environmental Restoration, LLC

A handwritten signature in black ink, appearing to read "Paul H. Werthman". The signature is fluid and cursive, written over the printed name of the signatory.

Paul H. Werthman, P.E.
Site Manager

C: Keith Nagel, Tecumseh Redevelopment
Elton Parker, Squire Sanders & Dempsey

File: 0071-001-110, CG

6/15/06

Data entry comments on the form sent to EPA by Tecumseh Redevelopment:

The attached form is incomplete. Therefore it cannot be entered into RCRAInfo database. It is stated in the cover letter that the attached is a Part A Application, but it is just a small part of it.

The RCRA Subtitle C Identification Form (EPA Form 8700-12) was sent without page # 2 page and the **entire** Hazardous Waste Permit Information Form (EPA Form 8700-23) was not included.

I've tried to reach the site contact person, Keith Nagel, on several occasions, but unsuccessfully.

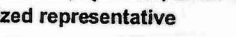
On June 15, 2006, I called the site manager, Paul H. Werthman and explained to him that a completed Part A should be sent to EPA Region 2. I've informed him that can find the Part A form and its instructions on the EPA Web site at (<http://www.epa.gov/epaoswer/hazwaste/data/form8700/forms.htm>).

As promised, the completed form should be sent to us shortly.

Hanna Maciejko,
Records Management Analyst
EPA Region 2
DEPP-RPB

MAIL THE COMPLETED FORM TO: The Appropriate EPA Regional or State Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		Rcd 6/17/04
1. Reason for Submittal (See instructions on page 25) CHECK CORRECT BOX(ES)	Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). <input type="checkbox"/> As a component of the Hazardous Waste Report.		
2. Site EPA ID Number (See instructions on page 26)	EPA ID Number: NY D 002 1134 1880		
3. Site Name (See instructions on page 26)	Name: Tecumseh Redevelopment, Inc.		
4. Site Location Information (See instructions on page 26)	Street Address: Hamburg Turnpike City, Town, or Village: Lackawanna State: NY County Name: Erie Zip Code: 14218		
5. Site Land Type (See instructions on page 26)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (See instructions on page 26)	A. 562910 B. _____ C. _____ D. _____		
7. Site Mailing Address (See instructions on page 27)	Street or P. O. Box: 3250 Interstate Dr. City, Town, or Village: Richfield State: OH Country: USA Zip Code: 44286		
8. Site Contact Person (See instructions on page 27)	First Name: Keith MI: A Last Name: Nagel Phone Number: (330) 659-9165 Phone Number Extension:		
9. Legal Owner and Operator of the Site (See instructions on pages 27 and 28)	A. Name of Site's Legal Owner: Tecumseh Redevelopment Inc. Date Became Owner (mm/dd/yyyy): 05/07/2003 Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other B. Name of Site's Operator: Tecumseh Redevelopment Inc. Date Became Operator (mm/dd/yyyy): 05/07/2003 Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

[illegible][illegible]

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Keith A. Nagel General Manager	6/10/04

2/5

ALL THAT TRACT OR PARCEL OF LAND, situate in the Town of Hamburg and the City of Lackawanna, County of Erie, State of New York, being part of Lots 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, & 25 of the Ogden Gore Tract and part of Lots 23, 24, & 36 of the Buffalo Creek Reservation, Township 10, Range 8 of the Holland Land Company's Survey and more particularly bounded and described as follows:

BEGINNING at a point on the westerly highway boundary of Hamburg Turnpike (66.0 feet wide), said point being 547.89 feet South 19°36'46" East from the intersection of the westerly highway boundary of Hamburg Turnpike (66.0 feet wide) and the northerly line of the City of Lackawanna (also being the southerly line of the City of Buffalo); thence South 19°36'46" East along the westerly highway boundary of Hamburg Turnpike (66.0 feet wide) a distance of 628.41 feet; thence along the westerly highway boundary of Hamburg Turnpike as appropriated by the New York State Department of Public Works as shown on Map No. 40-R2, Parcel No. 44 the following twenty (20) courses and distances:

- 1.) South 10°00'07" East a distance of 164.30 feet;
 - 2.) South 18°40'45" East a distance of 355.00 feet;
 - 3.) South 71°23'35" West a distance of 2.00 feet;
 - 4.) South 18°40'45" East a distance of 223.00 feet;
 - 5.) South 22°29'36" East a distance of 150.35 feet;
 - 6.) South 18°40'45" East a distance of 512.00 feet;
 - 7.) South 16°49'53" East a distance of 260.12 feet;
 - 8.) South 18°34'20" East a distance of 793.00 feet;
 - 9.) South 71°23'35" West a distance of 4.00 feet;
 - 10.) South 18°13'24" East a distance of 132.00 feet;
 - 11.) North 71°23'35" East a distance of 4.67 feet;
 - 12.) South 18°30'00" East a distance of 38.00 feet;
 - 13.) South 71°23'35" West a distance of 4.86 feet;
 - 14.) South 18°13'24" East a distance of 160.00 feet;
 - 15.) South 71°23'35" East a distance of 9.80 feet;
 - 16.) South 18°36'25" East a distance of 159.00 feet;
 - 17.) South 71°23'35" West a distance of 3.89 feet;
 - 18.) South 18°34'20" East a distance of 180.00 feet;
 - 19.) South 20°56'05" East a distance of 138.11 feet;
 - 20.) South 22°53'55" East a distance of 272.45 feet to a point on the westerly highway boundary of Hamburg Turnpike;
- thence southerly along the westerly highway boundary of Hamburg Turnpike, South 18°36'25" East, a distance of 2228.31 feet; thence along the westerly highway boundary of Hamburg Turnpike as appropriated by the New York State

3/5

Department of Public Works as shown on Map No. 27 Parcel No. 31 the following two (2) courses and distances:

- 1.) South $16^{\circ}17'25''$ East a distance of 74.93 feet;
- 2.) along a curve to the right having a radius of 1004.74 feet; a chord distance of 228.48 feet along a chord bearing of South $08^{\circ}12'16''$ East, a distance of 228.97 feet to a point on the westerly highway boundary of Hamburg Turnpike; thence southerly along the westerly highway boundary of Hamburg Turnpike, South $4^{\circ}35'35''$ West a distance of 940.87 feet; thence along the westerly highway boundary of Hamburg Turnpike as appropriated by the New York State Department of Public Works as shown on Map No. 1 Parcel No. 1 and Map No. 5 Parcel No. 7 the following eighteen (18) courses and distances:

- 1.) North $85^{\circ}24'25''$ West a distance of 1.00 feet;
- 2.) South $7^{\circ}01'17''$ West a distance of 170.15 feet;
- 3.) South $5^{\circ}02'54''$ West a distance of 180.00 feet;
- 4.) North $85^{\circ}24'25''$ West a distance of 3.00 feet;
- 5.) South $5^{\circ}02'54''$ West a distance of 260.00 feet;
- 6.) South $5^{\circ}09'11''$ West a distance of 110.00 feet;
- 7.) South $0^{\circ}34'35''$ West a distance of 110.27 feet;
- 8.) South $4^{\circ}50'37''$ West a distance of 220.00 feet;
- 9.) South $4^{\circ}50'37''$ West a distance of 365.00 feet;
- 10.) South $85^{\circ}24'25''$ East a distance of 5.00 feet;
- 11.) South $4^{\circ}06'20''$ West a distance of 67.00 feet;
- 12.) South $6^{\circ}04'35''$ West a distance of 248.08 feet;
- 13.) South $3^{\circ}18'27''$ West a distance of 52.01 feet;
- 14.) South $4^{\circ}55'58''$ West a distance of 133.00 feet;
- 15.) North $85^{\circ}24'25''$ West a distance of 1.00 feet;
- 16.) South $4^{\circ}55'58''$ West a distance of 45.00 feet;
- 17.) North $85^{\circ}24'25''$ West a distance of 7.00 feet;
- 18.) South $4^{\circ}56'12''$ West a distance of 90.00 feet;

to the northerly line of the lands of South Buffalo Railway Company; thence along the lands of South Buffalo Railway Company the following six (6) courses and distances:

- North $86^{\circ}44'25''$ West a distance of 507.02 feet;
North $57^{\circ}07'11''$ West a distance of 2221.31 feet;
North $65^{\circ}32'09''$ West a distance of 84.80 feet;
South $25^{\circ}31'26''$ East a distance of 20.98 feet;
South $18^{\circ}36'49''$ East a distance of 2677.31 feet;
South $13^{\circ}46'25''$ East a distance of 130.09 feet

feet to the northerly line of the lands of Buffalo Crushed Stone, Inc.;
thence North $87^{\circ}13'38''$ West a distance of 2090.0 feet to the shore line of Lake Erie;
thence northerly along the shore of Lake Erie and the Patent Line the following forty-three (43) courses and distances:

- 1.) North $16^{\circ}29'53''$ West a distance of 267.84 feet;
- 2.) North $24^{\circ}25'00''$ West a distance of 195.01 feet;

4/5

- 3.) North 26°45'00" West a distance of 250.00 feet;
- 4.) North 31°15'00" West a distance of 205.00 feet;
- 5.) North 21°35'00" West a distance of 110.00 feet;
- 6.) North 44°00'53" West a distance of 26.38 feet;
- 7.) North 33°49'18" West a distance of 74.86 feet;
- 8.) North 34°26'26" West a distance of 12.00 feet;
- 9.) North 18°36'25" West a distance of 2596.47 feet;
- 10.) South 71°23'35" West a distance of 58.16 feet;
- 11.) North 16°01'08" West a distance of 70.04 feet;
- 12.) North 49°07'00" West a distance of 79.00 feet;
- 13.) North 19°16'00" West a distance of 425.00 feet;
- 14.) North 16°37'00" West a distance of 285.00 feet;
- 15.) North 25°20'00" West a distance of 360.00 feet;
- 16.) North 33°00'00" West a distance of 230.00 feet;
- 17.) North 32°40'00" West a distance of 310.00 feet;
- 18.) North 27°10'00" West a distance of 130.00 feet;
- 19.) North 23°20'00" West a distance of 315.00 feet;
- 20.) North 18°20'04" West a distance of 302.92 feet;
- 21.) North 20°15'48" West a distance of 387.18 feet;
- 22.) North 14°20'00" West a distance of 530.00 feet;
- 23.) North 16°40'00" West a distance of 260.00 feet;
- 24.) North 28°35'00" West a distance of 195.00 feet;
- 25.) North 18°30'00" West a distance of 170.00 feet;
- 26.) North 26°57'26" West a distance of 239.41 feet;
- 27.) North 23°14'06" West a distance of 65.83 feet;
- 28.) North 31°56'05" West a distance of 85.52 feet;
- 29.) North 33°37'07" West a distance of 84.53 feet;
- 30.) North 30°04'26" West a distance of 97.31 feet;
- 31.) North 18°36'25" West a distance of 191.08 feet;
- 32.) North 00°19'50" East a distance of 24.35 feet;
- 33.) North 06°26'35" West a distance of 81.45 feet;
- 34.) North 11°44'28" West a distance of 463.58 feet;
- 35.) North 2°55'00" West a distance of 170.00 feet;
- 36.) North 6°45'00" West a distance of 240.00 feet;
- 37.) North 0°10'00" East a distance of 465.00 feet;
- 38.) North 2°00'38" West a distance of 378.58 feet to the northerly line of Letters Patent dated February 21, 1968 and recorded in the Erie County Clerk's Office under Liber 7453 of Deeds at Page 45; thence North 71°23'35" East along the north line of the aforementioned Letters Patent a distance of 154.95 feet to the shore line; thence along the shore line the following six (6) courses and distances:
 - 1.) South 80°14'01" East a distance of 119.30 feet;
 - 2.) North 46°15'13" East a distance of 47.83 feet;
 - 3.) North 59°53'02" East a distance of 53.32 feet;
 - 4.) North 38°20'43" East a distance of 27.31 feet;

5/5

5.) North 68°12'46" East a distance of 48.67 feet;

6.) North 26°11'47" East a distance of 11.48 feet to the northerly line of the aforementioned Letters Patent; thence along the northerly line of said Letters Patent, North 71°23'35" East a distance of 1755.19 feet; thence South 35°57'25" East a distance of 35.83 feet to a point on the U.S. Harbor Line; thence, North 54°02'35" East along the U.S. Harbor Line a distance of 200.00 feet; thence continuing along the U.S. Harbor Line, North 50°01'45" East a distance of 379.54 feet to the westerly line of the lands of Gateway Trade Center, Inc.; thence along the lands of Gateway Trade Center, Inc. the following twenty-seven (27) courses and distances:

- 1.) South 18°44'53" East a distance of 623.56 feet;
- 2.) South 34°33'00" East a distance of 200.00 feet;
- 3.) South 26°18'55" East a distance of 500.00 feet;
- 4.) South 19°06'40" East a distance of 1074.29 feet;
- 5.) South 28°03'18" East a distance of 242.44 feet;
- 6.) South 18°38'50" East a distance of 1010.95 feet;
- 7.) North 71°20'51" East a distance of 90.42 feet;
- 8.) South 18°49'20" East a distance of 158.61 feet;
- 9.) South 80°55'10" East a distance of 45.14 feet;
- 10.) South 18°04'45" East a distance of 52.13 feet;
- 11.) North 71°07'23" East a distance of 102.59 feet;
- 12.) South 18°41'40" East a distance of 63.00 feet;
- 13.) South 71°07'23" West a distance of 240.62 feet;
- 14.) South 18°38'50" East a distance of 668.13 feet;
- 15.) North 71°28'46" East a distance of 958.68 feet;
- 16.) North 18°42'31" West a distance of 1001.28 feet;
- 17.) South 71°17'29" West a distance of 168.48 feet;
- 18.) North 18°42'31" West a distance of 642.00 feet;
- 19.) North 71°17'37" East a distance of 17.30 feet;
- 20.) North 18°42'31" West a distance of 574.67 feet;
- 21.) North 71°17'29" East a distance of 151.18 feet;
- 22.) North 18°42'30" West a distance of 1156.43 feet;
- 23.) North 71°29'21" East a distance of 569.24 feet;
- 24.) North 18°30'39" West a distance of 314.71 feet;
- 25.) North 70°59'36" East a distance of 386.47 feet;
- 26.) North 18°30'39" West a distance of 70.00 feet;
- 27.) North 70°59'36" East a distance of 400.00 feet to the PLACE OR POINT OF BEGINNING.

Containing 1075.628±Acres.